

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)

Plaintiff,)

v.)

EAGLE GRAPHICS, INC and)
JOSEPH BENDER, in his capacity as President)
of Eagle Graphics, Inc.)

Defendants,)
_____)

C.A. No. 04-12509 DPW

MOTION FOR CIVIL CONTEMPT AGAINST
NEXT GENERATION PRINTING, INC.

NOW COMES the Plaintiff to move this court pursuant to Federal Rule of Civil Procedure 45(e) to issue a contempt subpoena to the Next Generation Printing, Inc., 179 Campanelli Parkway, Stoughton, MA. As set forth in the attached Affidavit, the undersigned served a subpoena to the Keeper of the Records of Next Generation Printing Inc. on June 20, 2005 requesting the production of documents necessary for the litigation of this matter no later than July 20, 2005. The Keeper of the Records failed to appear, failed on contact Plaintiff's attorney and failed to produce the requested documents.

WHEREFORE, Plaintiff requests that this Court:

- a. Issue a contempt subpoena ordering Next Generation Printing Inc. to produce the documents listed on Exhibit A of the subpoena at the office of Plaintiff's counsel within seven (7) days of the date of the subpoena;
- b. Find Next Generation Printing, Inc. in contempt;
- c. Award Plaintiff costs and fees incurred in preparing this motion;

d. Grant such other relief as the Court deems appropriate.

Dated: October 7, 2005

Respectfully submitted,

Catherine M. Campbell
BBO #549397629444
Feinberg, Campbell & Zack, P.C.
177 Milk Street
Boston, MA 02109
(617) 338-1976

/s/ Catherine M. Campbell
Attorney for Plaintiff

Certificate of Service

I, Catherine M. Campbell, hereby certify that I caused a copy of the foregoing to be mailed this day by U.S. first-class mail to Laurence Donoghue, Esq., Morgan, Brown & Joy, LLP, 200 State Street, 11th Floor, Boston, MA 02109-2605.

Date: October 7, 2005

/s/Catherine M. Campbell
Catherine M. Campbell